

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

In re NATIONAL PRESCRIPTION OPIATE) No. 1:17-md-2804
LITIGATION)
) Judge Dan A. Polster

This Document Relates To:)

)
ALL CASES)
)

PLAINTIFFS' MOTION FOR LEAVE TO FILE EXHIBITS UNDER SEAL

Pursuant to Local Rule 5.2, Plaintiffs seek leave to file Exhibits 1, 10, and 19 to the Declaration of Evan M. Janush in Support of Plaintiffs' Motion for Sanctions Against the Allergan and Teva Defendants ("Janush Declaration").

Local Rule 5.2 states: "No document will be accepted for filing under seal unless a statute, court rule, or prior court order authorizes the filing of sealed documents." Loc. R. 5.2. Exhibits 1, 10, and 19 to the Janush Declaration contain information that has been subject to Protective and Confidentiality Orders, including Case Management Order No. 2 and the amendment thereto (ECF Nos. 441 & 1357). This information is subject to this Court's Order Amending Procedures Regarding Redactions and Filing of Briefs Under Seal (ECF No. 1813).

Plaintiffs do not believe the information warrants remaining under seal but seek to comply with all applicable Orders concerning information that has been marked or designated as confidential.

Plaintiffs respectfully request to proceed in this manner so there are no inadvertent disclosures of information subject to Protective and Confidentiality Orders and to comply with this Court's orders.

WHEREFORE, Plaintiffs respectfully request the Honorable Court to grant Plaintiffs' Motion for Leave to File Exhibits Under Seal and to direct Defendants to indicate within three (3) business days whether they will assert any redactions.

Dated: August 31, 2020

Respectfully submitted,

/s/ Paul J. Hanly, Jr.

Paul J. Hanly, Jr.

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on August 31, 2020, the foregoing was filed electronically with the Clerk of Court using the Court's CM/ECF System, and will be served via the Court's CM/ECF filing system on all attorneys of record.

/s/Peter H. Weinberger

PETER H. WEINBERGER

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